

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

\*

**v.**

\*

**Criminal Case No. JKB-23-0278**

**CHRISTOPHER BENDANN**

\*

\*   \*   \*   \*   \*   \*   \*   \*   \*   \*   \*   \*

**MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS**

COMES NOW the defendant, Christopher Bendann, through counsel, Christopher C. Nieto, who hereby moves this Court for leave to file additional pretrial motions as discovery is still ongoing. In support thereof, he states as follows:

1. The defendant, Christopher Bendann, is charged in a multi-count indictment with five counts of Sexual Exploitation of a Minor and one count of Possession of Child Pornography, in violation of 18 U.S.C. § 2251(a) and § 2252A(a)(5)(B).

2. Based on this Court's scheduling order, defense pretrial motions are due today, February 8, 2024. However, although defense counsel has reviewed the discovery provided thus far by the Government, we fully expect that additional discovery will be provided by the end of the month. We, therefore, have not been able to determine the precise grounds for all possible pre-trial motions at this point.

3. Additional motions may become necessary during the discovery process in this case, and Mr. Bendann seeks permission of the Court to file any appropriate motions after the filing deadline of February 8, 2024. Undersigned counsel has spoken with Government counsel regarding this issue, and we understand that the additional discovery will be provided by the end of February. Accordingly, we propose a deadline date in March to address any issues within the newest batch of discovery that may exist.

4. Additionally, Mr. Bendann also requests leave to withdraw any motion, prior to any ruling by the Court, if the relief requested in such motion is no longer desired or appropriate.

WHEREFORE, Mr. Bendann requests that the Court allow him to amend, supplement, withdraw, or file additional motions as necessary, and grant such other relief as the nature of his case may require.

Respectfully submitted,

/s/

CHRISTOPHER C. NIETO  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 8<sup>th</sup> day of February, 2024, a copy of the foregoing Motion for Leave to File Additional Motions was delivered, via electronic mail, to Colleen McGuinn and Kimberly Hagan, Assistant United States Attorneys.

/s/

CHRISTOPHER C. NIETO  
Attorney for Mr. Bendann